



Massachusetts Solar Owners Association

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Dear Co-Chairs Lusardi and McKeever and Members of the Net Metering Task Force,

Thank you for the opportunity to comment on the important matters under consideration by the Net Metering Task Force. The Massachusetts Solar Owners Association (MASOA) is an organization of interested and motivated residential and commercial owners of solar systems in Massachusetts. MASOA is committed to supporting solar energy in Massachusetts as a vital tool for the Commonwealth to meet the legal mandates of the Global Warming Solutions Act (GWSA) of 2008 and the roadmap laid out by the Massachusetts Clean Energy and Climate Plan for 2020.

A summary of MASOA's recommendations on how to most cost-effectively maximize the benefits of solar for the Commonwealth is as follows:

- **Lift the net metering caps.** Net metering caps should be lifted in 2015 to create a smooth and sustainable path to the 1,600 MW capacity goal. A major overhaul of Massachusetts' solar policy is unnecessary – raising the caps will remove the primary barrier to the continued success of solar in the Commonwealth. Time is of the essence since the existing net metering caps will soon be reached within the next few months.
- **Avoid discouraging Solar Investment.** Previous legislation called for a minimum billing charge for solar owners, as well as reduced sizing of potential installations. We ask that future legislation not include these forms of disincentives, or other proposals derived from the ALEC anti-solar growth legislative playbook.
- **Align utility incentives to support increased solar.** In order to create a win-win dynamic, with all stakeholders aligned behind the goal of maximizing installed solar in Massachusetts, utility incentives will need to be adjusted. Like the utility incentives for supporting energy efficiency in the state, a financial mechanism needs to be developed and implemented that encourages and fairly rewards utilities for increased installation of solar. When stakeholder motivations are more closely aligned, continued success will follow.
- **Maintain the SREC II Program.** The SREC II program has a clear record of success and is the best way to achieve the 1,600 MW goal. Costs to ratepayers are limited, pursuant to the regulations, as DOER has the flexibility to review and adjust SREC Factors to respond to evolving market conditions.
- **Preserve virtual net metering in its current form.** Behind-the-meter solar projects and virtually net metered projects sized 1 MW AC or less (as well as larger **Community Solar** projects) should receive the same treatment in terms of net metering credit values and incentive structure. Approximately 80% of households and business in Massachusetts cannot take advantage of solar electricity because they rent or have a roof that is unsuitable for solar. In the interest of fairness, it is vital to preserve Massachusetts' existing virtual net metering policy to ensure that the benefits of solar are available to everyone in the Commonwealth.

Sincerely from the MASOA Board,

Christopher Smith, *Chair/Secretary*